

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SUSAN GLEASON, CANDI GABRIELSE,
Individually, and as representatives of a Class
of Participants and Beneficiaries
of the Bronson Healthcare Group, Inc.
403(b) Tax Sheltered Matching Plan,

Plaintiffs,

v.

BRONSON HEALTHCARE GROUP, INC.,

and

BOARD OF DIRECTORS OF BRONSON
HEALTHCARE GROUP, INC.,

and

JOHN DOE 1-30,

Defendants

Case No. 1:21-cv-00379-HYJ-PJG

Judge: Hon. Hala Y. Jarbou

Magistrate Judge Phillip J. Green

HANEY LAW FIRM, P.C.
Troy W. Haney
330 E. Fulton
Grand Rapids, MI 49503
(616) 235-2300 - Phone
(616) 459-0137 - Fax
thaney@troysaneylaw.com

WALCHESKE & LUZI, LLC
James A. Walcheske (WI# 1065635)
Scott S. Luzi (WI# 1067405)
Paul M. Secunda (WI#1074127)
235 N. Executive Dr., Suite 240
Brookfield, WI 53005
(262) 780-1953 – Phone
(262) 565-6469 – Fax
jwalcheske@walcheskeluzi.com
sluzi@walcheskeluzi.com
psecunda@walcheskeluzi.com

Attorneys for Plaintiffs

JACKSON LEWIS, P.C.
Blaine Veldhuis
2000 Town Center, Suite 1650
Southfield, MI 48075
(248) 936-1900 – Phone
(248) 936-1901 - Fax
Blaine.Veldhuis@Jacksonlewis.com

Howard Shapiro
Charles F. Seemann III
650 Poydras Street, Suite 1900
New Orleans, LA 70130
(504) 208-1755 - Phone
(504) 208-1759 - Fax
Howard.Shapiro@jacksonlewis.com
Charles.Seemann@jacksonlewis.com

Attorneys for Defendants

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Plaintiffs Susan Gleason and Candi Gabrielse (“Plaintiffs”) respectfully move the Court to: (1) preliminarily approve the Parties’ Class Action Settlement Agreement in the above-referenced matter; (2) approve the proposed Settlement Notice and authorize distribution of the Notice to the Settlement Class; (3) preliminarily certify the Settlement Class for settlement purposes; (4) schedule a final approval hearing; and (5) enter the accompanying Preliminary Approval Order.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Paul M. Secunda and exhibits attached thereto (including the Settlement Agreement attached as **Exhibit A**), the Declarations of Susan Gleason and Candi Gabrielse, and all files, records, and proceedings in this matter. Defendants join in the relief requested by Plaintiffs’ Motion for Preliminary Approval of Settlement. However, Defendants do not agree with the averments, statements, allegations, and claims stated by Plaintiffs in the Motion for Preliminary Approval of Settlement and the attached Exhibits.

Dated this 10th day of January, 2022

WALCHESKE & LUZI, LLC

s/ Paul M. Secunda

James A. Walcheske*

Scott S. Luzi*

Paul M. Secunda**

* admitted pro hac vice

** admitted in W.D. Mich.

235 N. Executive Dr., Suite 240

Brookfield, Wisconsin 53005

Telephone: (262) 780-1953

Fax: (262) 565-6469

E-Mail: jwalcheske@walcheskeluzi.com

E-Mail: sluzi@walcheskeluzi.com

E-Mail: psecunda@walcheskeluzi.com

HANEY LAW FIRM, P.C.

Troy W. Haney

330 E. Fulton

Grand Rapids, MI 49503

Telephone: (616) 235-2300

Fax: (616) 459-0137

E-Mail: thaney@troyhaneylaw.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2022, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: January 10, 2022

s/Paul M. Secunda
Paul M. Secunda